



U.S. Department of Justice

United States Attorney  
Southern District of New York

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

July 7, 2020

**BY ECF**

The Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: ***United States v. Richard Gaffey, 18 Cr. 693 (RMB)***

Dear Judge Berman:

The Government respectfully submits this letter, with the consent of the defendant Richard Gaffey, to request a one-week extension until July 20, 2020 to submit its sentencing submission. Gaffey is currently scheduled to be sentenced by the Court on September 24, 2020 at 10:30 AM;<sup>1</sup> the Government's submission is currently due on July 13, 2020.

The Government has reviewed the defendant's sentencing submission, which was filed yesterday. Given the length of the defendant's submission, the breadth of the arguments posed, and the volume of the exhibits and appendices attached thereto, and the need to respond to defendant von der Goltz's sentencing during the same period, the Government respectfully requests an additional week to file its response.

The Government has conferred with defense counsel William Lovett and Robert Buehler, who consent to this request. Counsel for Gaffey has also indicated their strong preference to keep Gaffey's sentencing date for September 24, and has asked the Government to express that preference in making this application.

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<sup>1</sup> The Government notes that in its previous submission regarding its letter request for an extension of time of one week to respond to Harald Johan von der Goltz's sentencing memorandum (Dkt. No. 227), the Government erroneously stated von der Goltz's sentencing date was September 24, 2020 at 10:30 AM. Rather, von der Goltz's sentencing date is set for September 21, 2020 at 11:00 AM, and Gaffey's sentencing date is set for September 24, 2020 at 10:30 AM. (*See* Dkt. No. 224).

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For the above reasons, the Government respectfully requests that its sentencing submission be due on July 20, 2020.

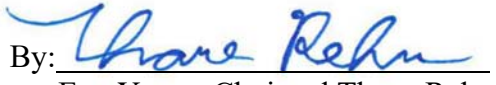
Respectfully submitted,

AUDREY STRAUSS

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Michael Parker  
Trial Attorney, Criminal Division

cc: Defense Counsel (by ECF)

<u>"One week extension for Government response is granted on consent.</u>	
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SO ORDERED:	
Date: <u>7/7/2020</u>	
Richard M. Berman, U.S.D.J.	